

AFFIDAVIT IN SUPPORT OF FORFEITURE COMPLAINT

I, Kansas Core, Task Force Officer of Homeland Security Investigations and a Certified and Commissioned Police Officer with the State of Oklahoma, being duly sworn, depose and state as follows:

1. I am a Task Force Officer with the Department of Homeland Security Investigations (HSI). I am currently assigned to the HSI Tulsa Resident Office and have been since February 2022. As such, I am an “investigative or law enforcement officers of the United States” within the meaning of Title 18, United States Code, Section 2510(7) and empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

2. I am further employed and commissioned in the State of Oklahoma as a Police Officer through the Tulsa Police Department (TPD) since July of 2018. I graduated the Tulsa Police Department Council on Law Enforcement and Training (CLEET) certified police academy in May 2019. I am designated as an investigator within the TPD Riverside Street Crimes Unit (RSCU) and currently assigned as a full-time Task Force Officer to HSI Tulsa. I have graduated and received a Bachelor of Science degree in Criminal Justice from the University of Oklahoma in May 2018. I am assigned to investigate a wide variety of crimes ranging from narcotics distribution, property crimes and thefts, violent crimes, weapons offenses, and organized criminal enterprises. Through my experiences, I have become familiar with, and have participated in a wide range of methods of investigations, including

but not limited to, use of physical surveillance, witness interviews, search warrants, arrest warrants, debriefings and operational use of informants, pen registers, surveillance of undercover transactions, consensually monitored and recorded conversations and phone calls, and reviews of recorded conversations. Additionally, I have participated in investigations that utilized the interception of wire and electronic communications (Title III) and have monitored/minimized numerous calls during these investigations. I attended Title 19 training courses and training courses specializing in the investigation of criminal organizations and money laundering. Through my training and experience, I am familiar with the methods used by criminal organizations to smuggle, safeguard, and to collect and launder illicit proceeds. Through training, education, and experience, I have become familiar with the manner in which criminal enterprises function and have received numerous hours in training from various federal, state, and local law enforcement agencies. Further, I have learned, gained insight, and expanded my training and knowledge relevant to the investigation of catalytic converter thefts to include topics on automotive manufacturing and repair processes, metal recycling and industrial refining, supply chain logistics and the precious metals market through various methods to include interviews and discussions with automotive mechanics, automotive dealerships, local scrapyards and metal recyclers and other industry professionals. Additionally, I have attended or took part in both formal and informal training on the topic of catalytic converter theft with subject matter experts to include

those of the National Insurance Crime Bureau (NICB), Oklahoma Used Motor Vehicle & Parts Commission (UMVPC), Oklahoma Department of Agriculture, Food and Forestry (ODAFF) and others.

3. This Affidavit is submitted in support of civil forfeiture complaint for the following property:

A. Property seized from Paradise Cove Marina at Sequoyah State Park at 2429 Park 56, Hulbert, Oklahoma 74441 on November 2, 2022:

1. A 2017 Four Winns H180 Boat, VIN PFWME077K617;
2. A 2017 Boat Trailer, VIN 556F8ZR13H2000070;
3. A 2022 Yamaha 252X recreation boat, Vessel ID No. US-YAMC0449J122, Hull No. US-YAMC0449J122; and
4. A 2022 Shorelander boat trailer, VIN 1MDASAW26NA735034;

B. Property seized from 24890 E. Highway 51, Broken Arrow, Oklahoma on November 2, 2022:

5. Approximately 4,084 pounds of ground precious metals;
6. Approximately 4,240 pounds of oxygen sensors;
7. Approximately 676 pounds of wiring harness;
8. Two catalytic de-canner machines;
9. A Yale Veracitor 40 VX forklifts;
10. A 2020 Black PJ trailer, VIN 4P5L5302X4335619;
11. A Toyota forklift;
12. Two Vibra Shake VS-1200 Dust Collectors; and
13. Approximately \$17,820.00 in United States currency;

C. Property seized from 25376 State Highway 51, Wagoner, Oklahoma on November 2, 2022:

15. \$700,000.00 in United States currency;
16. A Bobcat T770, AT6334043 with bucket; and
17. An AR Industries De-Canner and Compressor;

D. Property seized from 3 Bucks Mill Lane, Holmdel, New Jersey on November 2, 2022:

18. Approximately \$1,062,199.00 in United States currency;
19. All foreign currency;
20. A silver bracelet with clear stones in a Louis Vuitton bag;
21. A silver and orange Hermes bracelet, item no. ZG3203FB175;
22. A pair of silver earrings with clear stones;
23. A rose gold, round edge bracelet with clear stones;
24. A Rolex Oyster Perpetual Date Adjust watch, model no. 126610LN, serial no. 1CU40202;
25. Two yellow bracelets with clear stones in a red box;
26. A rose gold metal ring with red and clear stones;
27. A Marc Ecko watch with silver band, model no. E10561G1, serial no. 00-829-1972;
28. A Rolex watch with red and blue detail;
29. A Rolex watch with black and gold detail;
30. A Patek Phillipe watch;
31. A gold Rolex watch;
32. A Hublot watch;
33. A Rolex watch with black and silver detail;
34. A blue Bentley Motors by Breitling watch, model no. A25363;
35. Seventeen loose clear stones;
36. Thirteen gold bars; and
37. Approximately \$50,116.00 in United States currency;

E. Property seized in New Jersey on November 2, 2022:

38. A 2019 Ferrari 488 Pista, VIN ZFF90HLA6K0241124;
39. A 2017 Lamborghini Huracan, VIN ZHWUR1ZF2HLA06147;
40. A 2021 Mercedes Benz G63 AMG, VIN W1NYC7HJ1MX-371237;
41. A 2021 McLaren 765 LT Coupe, VIN SBM14RCA1MW765598;
42. A 2021 Jeep Gladiator, VIN 1C6HJTAG9ML569941;
43. A 2022 Mercedes Benz AMG GLE 53, VIN 4JGFD6BB1NA-789319; and
44. A 2016 Porsche Cayman GT4, VIN WP0AC2A82GK19169;

F. Bank accounts seized:

51. \$149,170.44 in United States currency seized from Arvest Bank account no. x7264 in the name of Tyler J. Curtis d/b/a Curtis Cores;

- 52. \$8,074.06 in United States currency seized from Arvest Bank account no. x9507 in the name of Tyler J. Curtis and Reiss N. Biby;
- 53. \$1,296.94 in United States currency seized from Arvest Bank account no. x1741 in the name of Tyler J. Curtis;
- 54. \$21,558.46 in United States currency seized from Arvest Bank account no. x5401 in the name of Tyler J. Curtis and Reiss N. Biby;
- 55. \$12,148.44 in United States currency seized from Investors Bank account no. x8534 in the name of DG Auto, LLC;
- 56. \$19,971.56 in United States currency seized from Citizens Bank Account No. X8534 in the name of DG Auto, LLC; and
- 57. \$8,409.78 in United States currency seized from Investors Bank account no. x6426 in the name of Navin Khanna and Amandeep Khanna;
- 58. \$241.80 in United States currency seized on November 17, 2022 from Investors Bank account x5510 in the name of DG Auto Parts, LLC;
- 59. \$13,168.21 in United States currency seized from Wells Fargo Bank account no. x1644 in the name of Tinu Khanna;
- 60. \$30,052.35 in United States currency seized from Robinhood Investments account no. x5385 in the name of Tinu Khanna;
- 61. \$398.42 in United States currency seized from TD Ameritrade Account no. x3668;
- 62. \$3,390.90 in United States currency seized from M&T Bank account no. x8252 in the name of Adam Sharkey and Marion Sharkey; and
- 63. \$35,472.60 in United States currency seized from M&T Bank account no. x7750 in the name of Capital Cores Corp.;

G. Bulk currency seized:

- 66. \$500,000 in United States currency seized from Shane Minnick on May 3, 2022, at Tulsa International Airport, 7777 E. Apache Street, Tulsa, Oklahoma;
- 67. \$1,129,000 in United States currency seized from Robert Sharkey on May 9, 2022 in Wyandotte, Oklahoma; and
- 68. \$1,075,000 in United States currency seized from Martynas Macerauskas on May 11, 2022;

H. Real property to be seized:

- 69. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements

- thereon, and all rights appertaining thereto, located at 73144 South 250 Road, Wagoner, Wagoner County, Oklahoma;
70. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at 25376 State Highway 51, Wagoner, Wagoner County, Oklahoma;
71. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at 3 Bucks Mill Lane, Holmdel, Monmouth County, New Jersey;
72. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at 242 Monmouth Road, Wrightstown, Burlington County, New Jersey; and
73. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at 18 Hanover Drive, Manalapan, Monmouth County, New Jersey.

(hereinafter, "Defendant Property").

4. It is the belief of your affiant that the Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because it is any property, real or personal, which constitutes or is derived from the proceeds traceable to a violation of 18 U.S.C. § 371 (Conspiracy to commit the following offenses), 18 U.S.C. § 1343 (Wire Fraud) and/or is property traceable to 18 U.S.C. § 1952(a) (interstate and foreign travel or transportation in aid of racketeering enterprises) and/or is property traceable to 18 U.S.C. § 2314 (transportation of stolen goods) and/or is property traceable to 18 U.S.C. § 2315 (RCSP); and the property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is any property, real or personal, involved in a transaction or

attempted transaction in violation of 18 U.S.C. § § 1956 and/or 1957 (money laundering).

5. The information set forth in this Affidavit is known to me both through my own investigation and from information and documentation provided to me by other sworn law enforcement personnel and individuals I find to be credible and reliable.

SUMMARY OF INVESTIGATION

6. The information described in these paragraphs below, furnished in support of this affidavit, is derived from my own observations and investigation, information and communications to me from other HSI agents, law enforcement officers and investigators. This affidavit will show Navin Khanna, Adam Sharkey, Robert Sharkey, Benjamin Mansour, Tyler Curtis, Reiss Biby, Martynas Macerauskas, Kristina Macerauskas, Parker Weavel, Shane Minnick, Ryan Larue, Brian Thomas, Michael Rhoden and others engaged in monetary transactions in property derived from a specified unlawful activity, transported stolen goods, received and concealed stolen goods and committed interstate travel in aid of racketeering, money laundering, and the proceeds generated from the below described violations of federal laws were deposited into the financial accounts and used to purchase assets described below.

FACTUAL BACKGROUND

7. Catalytic converters are a component of an automotive vehicle's exhaust device that reduce the toxic gas and pollutants from a vehicle's internal combustion engine into safe emissions by catalyzing a redox reaction process. Catalytic converters are required components on all automobiles in the United States as regulated by the Environmental Protection Agency.

8. Catalytic converters are targeted by criminals due to the precious metals (palladium, platinum and rhodium) contained within the converter's internal catalyst or core. These metals are commonly referred to as platinum group metals or PGMs. A worldwide supply shortage has continued to bring about an increase in PGMs' demand and value. Shortages from reduced mining operations in Africa, the implantation of similar environmental regulations requiring catalytic converters on vehicles in China, and international shipping delays have driven prices to an all-time high.

9. In November of 2020, the Tulsa Police Department ("TPD") noticed a drastic increase in catalytic converter thefts throughout Tulsa and the Northern District of Oklahoma. Local law enforcement began investigating the organized thefts, illegal scrap metal trafficking, and money laundering within Tulsa and the Northern District of Oklahoma. These crimes are part of numerous ongoing criminal enterprises across the United States. TPD investigators were assisted by special

agents with the Department of Homeland Security (“HSI”) and the Federal Bureau of Investigations (“FBI”) as the investigation progressed.

10. Through the investigation, agents have learned that a repair facility will typically unbolt a catalytic converter at a flange for easy installation of a replacement catalytic converter. If a mechanic cuts a catalytic converter with a torch or reciprocating saw, investigators learned a cut would be smooth and at a 90-degree angle, to allow for easy replacement. Investigators also learned that catalytic converters from newer vehicles have a lengthy life span and do not ordinarily require replacement.

11. Investigators learned that catalytic converters with rough or jagged edges and cuts made at uneven angles are signs of haphazard removal and indicia of a stolen catalytic converter. Investigators also learned that operable catalytic converters from newer vehicles are typically stolen catalytic converters.

12. TPD has arrested several local suspects involved in the catalytic converter thefts, including low-level thieves, identified as “cutters”. Cutters often have extensive criminal histories to include theft, drug possession and drug distribution. The investigation has shown catalytic converters are often stolen using handheld power tools and automotive tools. Cutters have focused their efforts towards catalytic converters because of the lucrative profit.

13. Cutters sell the stolen catalytic converters to “intermediate buyers.” This investigation has revealed that many intermediate buyers purchase stolen catalytic

converters through outwardly legitimate businesses with ties to scrap metal production, including automotive repair shops and used car dealerships. Intermediate buyers resell the stolen catalytic converters to “core buyers.” Large-scale core buyers purchase the stolen catalytic converters and then package and transport the shipments across state lines. The investigation has revealed that core buyers resell the stolen catalytic converters to “recyclers,” domestic industrial recycling plants, where the catalytic converters are refined and the PGMs are extracted. Core buyers also ship stolen catalytic converters to coastal ports to be shipped to foreign refineries. Refineries extract the PGMs and wire payment to the core buyer once the quantity of the precious metals is determined.

14. Catalytic converter theft has become a nationwide problem across all state, local and federal jurisdictions. Investigators have identified numerous investigations across dozens of states and are aware of numerous parallel federal investigations related to the purchasing and transportation of stolen catalytic converters.

The Tulsa Investigation of Curtis Cores

15. Investigators identified Tyler Curtis (“Curtis”), the owner and operator of Curtis Cores, located at 24890 East Highway 51, Broken Arrow, Oklahoma, as buying suspected stolen catalytic converters from intermediate buyers in Oklahoma, Arkansas, Louisiana, Kansas, Texas and other states since December 2020. The transactions are conducted daily and are ongoing. None of the identified intermediate

buyers have a business that would legitimately supply the amount of catalytic converters that Curtis and/or Curtis Cores purchases.

16. Curtis and Curtis Cores employs several full-time employees, including Brian Thomas, Ryan LaRue, Shane Minnick, Parker Weavel, Michael Rhoden, William Gibson. Curtis' family members also assist the day-to-day operations of the Curtis Cores business, including his wife, Reiss Biby, his mother-in-law, Kimberly Biby, and his father, Joseph Curtis.

17. Since December 2020, agents have observed bulk catalytic converters delivered to the Curtis Cores location by privately owned vehicles, rented U-Haul trucks and other means of transportation. Agents have also observed Curtis and Curtis Cores employees receive, evaluate, re-package, and transport the catalytic converters to other intermediate buyers and core buyers across the country, including DG Auto in New Jersey, Capital Cores Corp in New York, and Elevation Auto Core LLC in Colorado, and Dowa Metals & Mining America, Inc. in New Jersey.

18. Curtis receives and ships pallets of bulk quantities of catalytic converters through a shipping company in Tulsa, Oklahoma. Records confirm that the shipping company has also delivered multiple shipments to Curtis Cores from several Houston, Texas based intermediate buyers. The shipping records indicate Curtis and his employee, Ryan LaRue, as the receiver or sender of shipment to Adam Sharkey, Capitol Cores, and intermediate buyers in Houston, Texas. The invoices are labeled in a vague manner, most often listing the shipments as "auto parts." The investigation

has revealed that Curtis and others instruct intermediate buyers to not label shipment contents as “catalytic converters” to avoid inspection or law enforcement detection.

Curtis Buys from Low Level Intermediate Buyers

19. Investigators were able to identify several lower-level intermediate buyers in the Tulsa area, including Benjamin Mansour (“Mansour”), that sold stolen catalytic converters to Curtis and/or Curtis Cores. Neither of these lower-level intermediate buyers maintain a legitimate source of production or business which would legally supply the numbers of catalytic converters in which Curtis is purchasing.

20. In February 2022, a low-level intermediate buyer was interviewed by law enforcement. This individual advised that he knowingly purchased stolen catalytic converters and that he sold stolen catalytic converters to Curtis. He advised he did not tell Curtis the catalytic converters were stolen, but that Curtis probably knew they were stolen. He also advised law enforcement that Curtis was aware that he purchased catalytic converters from known cutters and knew the converters had been stolen.

21. The investigation also identified Curtis as purchasing catalytic converters through Facebook. On February 22, 2021, Curtis posted a Facebook Marketplace advertisement, utilizing a now deleted Facebook account, soliciting the purchase of catalytic converters. Investigators, utilizing a fictitious Facebook profile, sent a message to Curtis. The following was observed:

AGENT: how much do you buy and does it matter where they came from...
CURTIS: I buy as many as you got and no

Curtis' Arrest

22. On May 2, 2021, Curtis was arrested by TPD in possession of 128 suspected stolen catalytic converters. The catalytic converters had rough, jagged edges and cut at uneven angles, consistent with stolen catalytic converters. Curtis was also in possession of \$9,922.00 in U.S. currency, 3 grams of cocaine, 8 grams of heroin, numerous prescription medications, and a loaded handgun.

23. During an interview, Curtis stated he purchases catalytic converters from muffler shops and car lots, not from individuals, and that he ships the catalytic converters to Dowa Metals & Mining in New Jersey, where the catalytic converters are sent to Japan for refining and extraction of precious metals. While incarcerated, Curtis made several recorded phone calls to his parents and Reiss Biby. During the recorded calls, Curtis indicated his concern that law enforcement seized his iPad and phone and would have access to their contents. Curtis asked his parents to remove any incriminating evidence from the Curtis Cores location and his father confirmed that he would.

24. A May 2021 search warrant for Curtis' iPhone and iPad, revealed that Curtis was a large-scale "core buyer", affiliated with a larger criminal organization referred to as DG Auto. Investigators observed a March 21, 2021 screenshot sent by Curtis to Low of a news story of the arrest of two cutters. The following communications were observed:

LOW: yep, hopefully no names
CURTIS: That's what I was thinking with the notepad they found

you never told them my name right?
LOW: nope
CURTIS: Good. I hope they never wrote your name down either.
LOW: I know
CURTIS: Just be careful

Curtis Sells Catalytic Converters Outside Oklahoma

25. The investigation revealed evidence of deliveries of stolen catalytic converters to Curtis Cores, receipt of stolen catalytic converters by Curtis Cores, deliveries of stolen catalytic converters by Curtis Cores to core buyers outside the state of Oklahoma and deliveries of bulk currency to Curtis Cores from DG Auto and Adam Sharkey.

26. The investigation revealed that on January 13, 2022, a shipment of catalytic converters was received by a freight company in Tulsa, Oklahoma. The shipment was sent by identified intermediate buyer Jose Romero of Houston, Texas. This delivery was received by Curtis Cores employees and transported to the Curtis Cores location.

Transportation of Bulk Currency

27. The investigation revealed that in April 2021, DG Auto wired \$500,000 to Nick Papouloglou ("Nick Emporia"), the operator of DG Auto South, in Richmond, Virginia. Agents confirmed that Curtis' father, Joseph Curtis drove to Richmond, Virginia to receive the currency from Nick Emporia on April 21, 2021.

28. On May 3, 2022, federal agents identified Shane Minnick, an employee of Curtis Cores, traveling to Brighton, Colorado in a rented UHaul with bulk catalytic converters. After delivering the catalytic converters to Julian Baros, the owner and

operator of Elevation Cores, Minnick purchases a return flight from Denver, Colorado. Upon arrival in Tulsa, Oklahoma, Minnick was detained by federal agents. Agents located and seized \$500,000 in U.S. currency.

29. On May 8, 2022, Wyandotte Nation Tribal Police Department conducted a traffic stop of a rented Penske truck driven by Robert Sharkey. During a search of the truck, officers located three pallets of catalytic converters with rough cuts and approximately \$1,129,000 in U.S. currency. The investigation revealed that \$290,000 of the seized currency was intended to be provided to Curtis from Adam Sharkey to pay Houston, Texas intermediate buyers.

30. On July 29, 2022, law enforcement seized approximately \$1.2 million in U.S. currency in the trunk of a car driven by Kristina Macerauskas (“K. Macerauskas”) near Amarillo, Texas. K. Macerauskas is the wife of Marty Macerauskas (“M. Macerauskas”), the owner of M & M Core Buyers. The investigation has revealed that M & M Core Buyers is an intermediate buyer of stolen catalytic converters that sells stolen catalytic converters to DG Auto and coordinates shipments of stolen catalytic converters with other intermediate buyers like Curtis and Adam Sharkey. K. Macerauskas admitted to law enforcement that she had obtained the currency from Khanna’s home in New Jersey and was traveling home to Amarillo, Texas. A federal search warrant was executed at the Macerauskas residence and business locations. Investigators located approximately 30 pallets of suspected stolen catalytic converters

and approximately \$25,000 in U.S. currency. M. Macerauskas later admitted to law enforcement that he sends his catalytic converters to DG Auto in New Jersey.

The Investigation of Houston Cores

31. In April 2022, a Houston-area sheriff deputy was fatally shot after approaching a cutter attempting to steal a catalytic converter from his vehicle. In July 2022, HSI-Houston and local Houston law enforcement began investigating a group led by Isaac Castillo (“Castillo”) and others. In July 2022, federal agents executed search warrants at multiple Houston, Texas locations and seized over 400 stolen catalytic converters, a stolen vehicle, 29 firearms, cocaine, marijuana, and over \$400,000 in illicit proceeds.

32. During the Houston investigation, law enforcement observed Armando Martinez pay individuals in cash for catalytic converters at his residence and transport the catalytic converters in a black GMC truck. Later, investigators conducted a traffic stop on the black GMC truck, driven by Castillo. Castillo possessed approximately 70 catalytic converters and approximately \$25,000 in U.S. currency. Agents became aware that Castillo was driving stolen catalytic converters to Curtis Cores in Oklahoma.

33. In March 2022, the black GMC truck, driven by Castillo, was observed at the Curtis Cores location, pulling a U-Haul trailer. The black GMC truck was observed again at the Curtis Cores location in April 2022, unloading suspected stolen catalytic converters.

34. On May 3, 2022, officers observed Castillo in Houston, Texas meet with an ABF Freight driver and load multiple containers onto the trailer. Armando Martinez was subsequently stopped for a traffic violation by Houston officers and found in possession of 87 stolen catalytic converters. Tulsa officers confirmed Curtis Cores received a shipment on May 4, 2022.

35. In October 2022, Castillo was interviewed by law enforcement and admitted that Curtis was aware the catalytic converters he received were stolen. Castillo advised that Curtis also told him to not talk about it and advised him which vehicle make and model to seek out. Castillo said Curtis also encouraged the delivery of catalytic converters from Toyota Tacomas, Toyota Tundras, and Ford F250s. Agents are aware these models of catalytic converters are often targeted by catalytic converter thieves.

36. Castillo advised that Curtis keeps approximately \$500,000 in currency in his desk drawer at the Curtis Cores location. Castillo advised that when Curtis needed more money, he would withdraw it from the bank or retrieve it from his residence.

37. On July 28 2022, Castillo was arrested after leaving the Curtis Cores location. Officers located \$80,000 in U.S. currency concealed in the shoulder seatbelt housing and seatbelt roller area of his truck. Castillo advised law enforcement that Curtis assisted in concealing the bulk currency in his truck prior to his departure.

The Investigation of DG Auto

38. The investigation revealed that DG Auto is a New Jersey based wholesale purchaser of catalytic converters, owned and operated by Navin “Lovin” Khanna

(“Khanna”). His brother Tinu Khanna is involved in the management and daily operations of the business. DG Auto has several locations, advertised on their public website, including New Jersey, Wisconsin, Virginia, and Mississippi.

39. These nationwide locations are grouped under regional buyers, including DG Auto Midwest and DG Auto South. DG Auto Midwest is located in Wisconsin and operated by Brandon Rick (“Rick”). DG Auto South is located in Richmond, Virginia and is operated by Nick Emporia.

40. The investigation has shown that DG Auto acquires stolen catalytic converters and resells them to domestic and foreign recyclers, industrial recycling plants that refine and extract the catalytic converters’ PGMs.

41. Dowa Metals & Mining America (“Dowa”) is a Burlington, New Jersey based refinery that purchases catalytic converters and its PGMs from DG Auto. Dowa ships the PGM material to its parent company Nippon PGM where it is received by its partner company, Tanaka, based in Akita, Japan to be refined down through a process called “toll refining”. The precious metals are refined, extracted, and weighed, with payment issued to DG Auto.

DG Auto Tiered Structure

42. Communications observed on Curtis’ cellphone and iPad show a tiered structure of DG Auto, where Tier 1 buyers, or high-level intermediate buyers, communicate and coordinate directly with DG Auto and Khanna. Tier 1 buyers are separated geographically throughout the United States and oversee the lower Tier 2

and Tier 3 buyers, or lower-level intermediate buyers. The lower-level buyers are restricted to selling catalytic converters to their regional Tier 1 buyers and not directly to DG Auto, creating a monopoly for Tier 1 buyers within their region. Through these observed communications, investigators learned that Khanna, Curtis and other high-level intermediate buyers have discussed the tier system and which tiers to assign specific affiliates of the DG Auto Organization.

43. The investigation has shown that DG Auto provides various operational, financial, and other incentives to members, such as Curtis. DG Auto provides assistance to higher-level intermediate buyers by supplying cash flow. Agents have learned that DG Auto has concealed and sent bulk currency to higher level intermediate buyers, like Curtis Cores, to facilitate the purchase of large quantities of stolen catalytic converters. Communications revealed that Curtis requires cash to pay his suppliers, as the majority of his customers only accept cash payment, not wired funds.

The DG Auto Website

44. DG Auto also provides logistical support to its members with a website (www.dgcatalytic.com) and web-based phone application, providing real-time price values of catalytic converters by searching a catalytic converter's specific parts codes. DG Auto provides features on both the website and phone application to members which include "hedging" and "margin" features, allowing Tier 1 core buyers to set the margin of profit for lower-level intermediate buyers, or Tier 2 or Tier 3 buyers. DG

Auto affiliates are given access to the ability to “hedge” their product prices, otherwise known as “locking in” the current value of the catalytic converters at the current market price, to prevent profit loss from the fluctuating PGM commodity market in the event of a price drop in the future before a delivery may be fully transported, shipped, and refined with funds received.

45. Through the Facebook search warrant, investigators have viewed group messages between Curtis and co-conspirators Adam Sharkey, L. Khanna, and numerous other DG Auto members in which they discuss details of their knowledge of the stolen source of the purchased catalytic converters and other criminal conspiracy.

46. M. Macerauskas advised he has purchased catalytic converters from “Aaron” in Houston but the Houston people were Curtis’ guys. He also advised that Khanna does not care where the catalytic converters come from, only that he wants the volume so he can keep up with the sales to Dowa. K. Macerauskas advised that stolen catalytic converters are typically cut and are often “torpedoes”, catalytic converters from Toyota Tundras.

47. K. Macerauskas estimated that approximately 25% of the people she and M. Macerauskas buy from are selling stolen catalytic converters.

48. K. Macerauskas stated that DG Auto pays for catalytic converters in cash and that Khanna has a safe under his desk at the business location. She said that if an intermediate buyer does not want to work with Khanna, Khanna will send another

buyer into the area and overpay other suppliers to put the person out of business. K. Macerauskas advised that Khanna, Curtis and Marty have access to “lower the percentage” on the DG Auto app – meaning they can manipulate the percentages that lower level intermediate buyers get paid for catalytic converters.

Investigation of Capital Cores

49. Investigators identified Adam Sharkey (“Sharkey”), the owner and operator of Capital Cores, located in West Islip, New York, as buying suspected stolen catalytic converters from intermediate buyers in Oklahoma and Texas since 2019.

50. During the May 8, 2022 seizure of approximately \$1,129,000 in U.S. currency by Wyandotte Nation Tribal Police Department, Robert Sharkey (“Robert”) provided various narratives of the purpose of his travels and the sources of the catalytic converters and currency. Robert advised he was driving to Broken Arrow, Oklahoma to visit his cousin, before continuing on to Dallas, Texas. Investigators later learned that the currency was intended to be delivered to Ryan LaRue and Brian Thomas, both employees of Curtis Cores, at the Curtis Cores location.

51. During the traffic stop and resulting seizure, investigators observed Curtis Cores employees outside the Curtis Cores shop pacing and appearing to wait for Robert’s delivery. The investigation revealed that when Curtis was advised of the interdiction, Curtis called Sharkey, stating that they were “fucked”, and that Robert should have driven a different vehicle to avoid law enforcement detection. A Curtis Cores employee drove to Robert’s location to pick him up. Robert later apologized to Curtis

and advised Curtis that all future currency deliveries should be concealed. Curtis advised that most of the currency was intended for M. Macerauskas and that he hoped Khanna would understand.

52. K. Macerauskas advised that Sharkey makes a percentage off Curtis every time Curtis sells catalytic converters to Khanna. K. Macerauskas advised law enforcement that Sharkey was providing catalytic converters to Curtis for Curtis to sell to someone besides Khanna. She is unaware who purchases these additional catalytic converters.

FBI-Sacramento Investigation of Vang Cores

53. Vang Auto Core is an illegitimate dismantler business in Sacramento, California. Tou Sue Vang (“Vang”), the owner, purchases stolen catalytic converters from regional thieves, consolidates them, and then ships them to DG Auto in New Jersey. Shipping manifests and financial records show that Vang Auto Core sells its stolen catalytic converters exclusively to DG Auto. In return, DG Auto wires Vang Auto Core payments.

54. In March 2020, investigators discovered that Vang was conducting an illegal, large-scale fencing operation of stolen catalytic converters in the Sacramento, California area. FBI-Sacramento initiated an investigation into Vang Auto, Vang and his brother Andrew Vang (“A. Vang”), and other potential co-conspirators concerning the large-scale theft of catalytic converters and their transportation across state lines.

55. In November 2020, Vang Auto Core’s business license was suspended by the California Franchise Tax Board, causing it to lose its rights, powers, and privileges to

do business in California. Since November 2, 2020, Vang and A. Vang were operating a suspended auto wrecking business from their personal residence, located at 7331 Meadowgate Drive, in Sacramento, California. The investigation has revealed that the Vang Auto Core bank accounts are controlled by Vang and A. Vang. During surveillance operations of the Meadowgate residence, agents observed a large number of individuals driving to the residence. Agents believe the individuals were selling stolen catalytic converters to Vang and A. Vang.

56. In 2020, the Davis Police Department initiated an investigation of Dao Xiong (“Xiong”) for suspected catalytic converter theft. Evidence showed that Xiong stole numerous catalytic converters and drove to Vang’s Meadowgate residence between September 2020 and February 2021.

57. In August 2020, a search warrant for the cellular telephone associated with a known cutter in Sacramento, California was executed. Subject to the search warrant, agents discovered Facebook messages between the cutter and an individual the investigation has later revealed to be Choy Saeteurn (“Saeteurn”). The two discussed the sale of catalytic converters and that a sale had to be aborted because of the presence of security guards. A search warrant for Saeteurn’s Facebook account revealed a connection to Khanna, Sharkey and Vang.

58. On or around September 3, 2020, agents observed a conversation between Saeteurn and Vang over Facebook Messenger. The following was observed:

VANG:	You back yay! <3
SAETEURN:	Back where?

VANG: Buying lol
SAETEURN: One step at a time Not touching tho
VANG: Yeah just you know becareful I'm still buying but
very dl very dl
SAETEURN: Yea imma just stay on The dL

59. Agents believe conversation suggests that Vang was discussing the fact that he was buying catalytic converters, but on the "dl", which agents believe to mean "down low" or discreetly. Agents believe Vang would be concerned about purchasing catalytic converters on the down low because of his May 2019 arrest for stealing catalytic converters.

60. On September 10, 2020, agents observed a conversation between Saeteurn and Khanna over Facebook Messenger. The following was observed:

L.

KHANNA: I need more Prius lol
SAETEURN: Where your boy at Tou?
KHANNA: Dang. He shipped me 300 sets today.
SAETEURN: I domt have those connections. Dammm

61. Based on training, experience, and information learned in this investigation, agents believe that Khanna asked Saeteurn for additional Prius catalytic converters. Agents believe that "Tou," is Vang and that Vang had shipped Khanna 300 Prius catalytic converters on that date. Wells Fargo bank records for a Vang Auto Core account (WF Account 7846) show the receipt of a \$400,000 wire transfer from DG Auto the following day. Agents believe the wire transfer is payment for the 300 catalytic converters Vang sent to Khanna.

62. Shipping records between January 2017 and August 2021 revealed Vang Auto Core shipped catalytic converters from California to DG Auto or Dowa in New Jersey. The combined shipments were labeled "auto parts" or "machine parts."

FINANCIAL INVESTIGATION

63. Investigators and agents have reviewed numerous bank accounts, wire transactions, employment records, state registrations, information obtained from Title III intercepts, interviews, and other documents to conduct the financial investigation of Navin Khanna, Adam Sharkey, Robert Sharkey, Benjamin Mansour, Tyler Curtis, Reiss Biby, Martynas Macerauskas, Kristina Macerauskas, Parker Weavel, Shane Minnick, Ryan Larue, Brian Thomas, Michael Rhoden and others participating in the conspiracy. The purpose of the conspiracy was for the conspirators to unlawfully enrich themselves by stealing catalytic converters from private vehicles within the Northern District of Oklahoma and elsewhere, then selling the catalytic converters to intermediate buyers and core buyers outside of the state of Oklahoma. The financial investigation is ongoing and reflects the parties are still active in the conspiracy.

CURTIS ASSETS

64. Prior to registering Curtis Cores with the Oklahoma Secretary of State, investigators found Curtis reporting his monthly gross pay from Green Country Auto

in March 2018 as \$2,437.50 and in March 2019 as \$2,250.00. Investigators were unable to identify any other income or assets.

65. A marriage application was filed with the State of Oklahoma in July 2021 for Curtis and Reiss Biby.

66. For all known financial accounts, the combined bank account balances for Curtis and Reiss Biby, prior to the opening of Curtis Cores, was approximately \$845.00. Investigators did not identify any other significant funds, cash on hand, or other assets pertaining to Curtis prior to his engaging in the sale of stolen catalytic converters. Based on a review of financial records, purchases of bulk catalytic converters from legitimate sources by Curtis have not been identified.

Arvest Bank Account Number 35057264 (Def. No. 30)

67. Curtis opened account number 35057264 styled Tyler J. Curtis doing business as Curtis Cores on October 16, 2020, as the only signatory for the account. On May 4, 2021, Curtis added his father Joseph E Curtis, Reiss Biby, and Kimberly Biby as signatories to the account. Joseph Curtis was removed as a signatory from the account in July 2021. Information indicated that Kimberly Biby does bookkeeping work for Curtis Cores LLC.

68. From October 2020 through December 2020, Curtis deposited approximately \$5,270 to the account primarily consisting of checks from Green Country Auto Core. DG Auto Parts LLC conducted business with Green Country Auto Core from August 2020 to January 2021 and paid them over \$2 million during that time period.

Investigators believe Curtis established a relationship with Khanna through the owner of Green Country Auto Core.

69. The account balance on January 1, 2021, was \$105. From January 2021 through September 2022 Curtis deposited more than \$15 million relating to the sale of catalytic converters, primarily consisting of funds received from DG Auto Parts LLC, Elevation Auto Core LLC, and Capital Cores Corp, representing proceeds from illegal activity, a majority of which was paid by the entities after the May 2021 arrest of Curtis. Curtis, Reiss Biby, and Kimberly Biby withdrew approximately \$3 million cash from the account. Evidence indicates that Curtis used cash to pay cutters and other low level sellers for stolen catalytic converters.

70. From July 2021 through March 2022 Curtis directed wire transfers of more than \$6 million from account 35057264 to individuals and businesses believed by law enforcement to sell stolen catalytic converters. Arvest Bank account 35057264 had an approximate balance of \$396,078 on October 20, 2022.

71. On November 2, 2022, a Federal Seizure Warrant was executed for the funds in Arvest Bank account ending 7264. On November 17, 2022, \$149,170.44 was seized from Arvest Bank account ending in 7264.

Arvest Bank Account Number 28561741 (Def. No. 32)

72. Curtis opened account number 28561741 styled Tyler J Curtis in July 2016 and is the only signatory on the account. A minimal account balance was maintained in the account from July 2016 through November 2020. The account balance on

November 2, 2020, was \$11.56. Curtis deposited \$11,100 cash to the account in November 2020 through January 2021. From February 2021 through April 2022 Curtis transferred over \$34,000 from Arvest Bank account 35057264 (Def. No. 30) to account 28561741 representing illegal proceeds. The account had less than \$1,300 deposits from May 2022 through September 6, 2022 and had an approximate balance of \$1,306 on October 20, 2022.

73. On November 2, 2022, a Federal Seizure Warrant was executed for the funds in Arvest Bank account ending 1741. On November 17, 2022, \$1,296.94 was seized from Arvest Bank account ending in 1741.

Arvest Bank Account Number 36409507 (Def. No. 31)

74. Arvest Bank account number 36409507 was opened in the name of Tyler J. Curtis and Reiss N. Biby on April 2, 2021, who are the only signatories on the account. From July 2021 through March 2022, \$80,550 was transferred from Arvest Bank account 35057264 (Def. No. 30) to account 36409507 representing illegal proceeds. The account had an approximate balance of \$76 on October 20, 2022.

75. On November 2, 2022, a federal seizure warrant was executed for the funds in Arvest Bank account ending 9507. On November 17, 2022, \$8,074.06 was seized from Arvest Bank account ending in 9507.

Arvest Bank Account Number 41435401 (Def. No. 33)

76. Arvest Bank Account Number 41435401 was opened in the name of Tyler J. Curtis and Reiss N. Biby on August 29, 2022, who are the only signatories on the

account. A \$5,000 transfer was made from Arvest account 35057264 (Def. No. 30) to open the account representing illegal proceeds. The approximate balance in the account on October 20, 2022, was \$26,977.

77. On November 2, 2022, a federal seizure warrant was executed for the funds in Arvest Bank account ending 5401. On November 17, 2022, \$21,558.46 was seized from Arvest Bank account ending in 5401.

**The 2017 Four Winns H180 Boat and trailer (Def. Nos. 1 and 2)
and the 2022 Yamaha 252X Boat and trailer (Def. Nos. 3 and 4)**

78. Curtis purchased a 2017 Four Winns H180 Boat and a 2017 boat trailer on or about June 19, 2021 from Action Powersports Incorporated and paid \$43,593 cash, representing proceeds from illegal activity.

79. Curtis purchased a 2022 Yamaha 252X recreation boat (Vessel ID Number US-YAMC0449J122, boat hull number US-YAMC0449J122) and 2022 Shorelander boat trailer (VIN 1MDASAW26NA735034) with proceeds of the illegal activity. Curtis financed \$50,000 of the value of the boat.

73144 South 250 Road, Wagoner, Oklahoma (Def. No. 46)

80. In or about March 2021, Tyler Curtis contracted with a builder for the construction of the residence located at 73144 South 250 Road, Wagoner, Oklahoma. Payments were made toward the construction of the property during 2021. Records provided by Arvest Bank account ending 7264 (Def. No. 30) reflect the following wires for the construction of the real property:

08/27/2021	\$2,100.00
09/02/2021	\$25,300.00
09/09/2021	\$20,000.00
10/01/2021	\$48,700.00
10/08/2021	\$30,000.00
10/22/2021	\$30,000.00
10/29/2021	\$5,200.00
11/12/2021	\$22,000.00
11/19/2021	\$34,600.00

The single-family residence was built on and parceled from acreage located at 25376 Highway 51, Wagoner, Oklahoma (Def. No. 47). No liens or mortgages were found to be recorded on the real property and the Wagoner County Central Appraisal District lists the total improvement value as approximately \$400,000.

25376 State Highway 51, Wagoner, Oklahoma (Def. No. 47)

81. On November 2, 2022, Homeland Security Investigations executed federal search warrants on the Curtis Residence (Def. No. 46) and the Biby residence (Def. No. 47). Among items located and seized, it was determined that Kimberly Biby, assisted in maintaining Curtis Cores financial records and bookkeeping activities. It is believed these activities were done within the Biby residence.

82. Officers also located approximately \$700,000 in concealed United States currency, belonging to Tyler Curtis (Def. No. 14). Tyler Curtis later admitted to law enforcement that the concealed currency at the Biby residence was his money that he received from DG Auto from the sale of stolen catalytic converters.

83. A search of the defendant property uncovered a de-canner machine (Def. No. 16) with parts of catalytic converters in a pile nearby. The de-canner machine was

between the Curtis and Biby residence. Agents also located a Bobcat T770, AT6334043 with bucket (Def. No. 15). This machinery is believed to facilitate the specified unlawful activity.

Curtis Cores Location

84. The primary Curtis Cores' business location, located at 24890 East Highway 51, Broken Arrow, Oklahoma was searched by federal agents on November 2, 2022. During the search, agents located approximately 4,084 pounds of ground precious metals from catalytic converters (Def. No. 5), approximately 4,240 pounds of oxygen sensors (Def. No. 6), approximately 676 pounds of wiring harness (Def. No. 7). These materials are byproducts of processing catalytic converters and are believed to be proceeds and facilitating property of a specified unlawful activity.

85. Additionally, agents recovered two catalytic de-canner machines (Def. No. 8), two forklifts (Def. Nos. 9 and 11), two Vibra Shake VS-1200 dust collectors (Def. No. 12), and a 2020 utility trailer (Def. No. 10). Agents believe these machines are used to facilitate in the receipt, transport and processing of stolen bulk catalytic converters.

86. Agents further recovered \$17,820 in U.S. currency (Def. No. 13) in the Curtis Cores business location. Agents believe, based on the investigation, that the money kept at the business location was to pay sellers for stolen catalytic converters. It is further believed that the currency is proceeds of the sale and receipt of stolen catalytic converters.

KHANNA'S ASSETS

87. In August 2022, Khanna attempted to obtain financing related to the purchase of a salvage yard in New Jersey. During intercepted communications on August 15, 2022, agents observed communications between Khanna and a phone number associated with ACE Funding Source. Agents observed Khanna state that he went into the junkyard business with his brothers in 2011 through 2013, but he went out on his own after a while. Khanna stated he wasn't doing very well until he partnered with Dowa Metals and Mining who were trying to make their way in the market. Khanna stated during this call that most of his business comes from Dowa which was corroborated by bank account records.

88. Khanna initially operated as DG Auto Wreckers LLC until approximately February 2020 at which time he began operating as DG Auto Parts LLC ("DG Auto"). Over the course of the investigation, investigators have identified several bank accounts related to the two entities with Khanna, and/or Amandeep Khanna and Tinu Khanna as signatories. Dowa accounted for almost all proceeds received by the two entities with the initial proceeds being received by DG Auto Wreckers LLC in April 2019. Payments from DG Auto Wreckers LLC to Vang Auto associates were identified as early as October 2019 indicating subsequent proceeds from Dowa as illegal proceeds, based on the interstate transportation of stolen property from Vang Auto. Payments from Dowa to DG Auto from 2021 forward included additional illegal proceeds based on the transportation of stolen property from Curtis Cores and

M&M Core Buyers and others. The two DG Auto entities received over \$600 million via wire transfers from Dowa from April 2019 through September 2022, and over \$130 million in bulk currency was withdrawn from related bank accounts.

89. Khanna initially operated as DG Auto Wreckers LLC and maintained accounts at Wells Fargo including account number 722946229¹ from approximately April 2019 through July 2019. Dowa wire transferred approximately \$228,000 to this account. Accounts were then maintained at Bank of America, including account number 381051849405 from July 2019 through April 2020. Dowa wire transferred over \$12 million to this Bank of America account which was utilized in part to wire transfer Vang Auto over \$1.3 million and to withdraw large amounts of currency.

90. Khanna then began operating as DG Auto Parts LLC with the following accounts, all of which received illegal proceeds and withdrew large amounts of bulk currency used to pay cutters:

- TD Bank account number 43690206004 (“TD Account 6004”) was maintained from February 2020 through April 2022. Dowa wired transferred over \$174 million to this account. DG Auto wired over \$2.5 million in funds from this account to Capital Cores, \$14 million to Vang Auto, and \$165,000 in payments related to Curtis Cores.
- Wells Fargo account number 2511621308 was maintained from March 2021 through April 2022. Dowa wire transferred over \$18 million to this account. DG Auto wire transferred \$1 million in funds from this account to Capital Cores and over \$500,000 to Curtis Cores.
- Valley National Bank account number 42005035 was maintained from April 2021 through June 2022. Dowa wired transferred over \$224 million to this account. DG Auto wire transferred funds from this account to Vang Auto in

¹ Wells Fargo Account 722946229 is either closed or inactive.

an amount over \$11 million, to Capital Cores in an amount over \$26 million, to Curtis Cores in an amount over \$4 million, and to M&M Core Buyers of in an amount over \$4 million.

- Investors Bank account number 1001808534 (Def. No. 34 and 35) was opened in November 2021 and is the current primary account for DG Auto after the closure of the previously referenced bank accounts. Dowa wired transferred over \$175 million to this account. DG Auto wire transferred funds from this account to Capital Cores in an amount over \$13 million, to Curtis Cores in an amount over \$9 million, and to M&M Core Buyers in an amount over \$2 million².

Investors Bank account number 1001808534 (Def. Nos. 34 and 35)

91. Investors Bank account number 1001808534 was opened in the name of DG Auto LLC on November 4, 2021. Signatories for the account are Navin Khanna, Tinu Khanna, and Amandeep Khanna. The account was initially funded with wire transfers consisting of illegal proceeds from the Valley National Bank account number 42005035. The account was primarily used to withdraw cash during the first two months the account was open. The account became the primary account DG Auto uses to pay for stolen catalytic converters via wire transfers, cash withdrawals and checks beginning in January 2022. Wires from Dowa into this account totaled over \$175 million from January 18, 2022, through September 30, 2022, representing illegal proceeds. Cash withdrawals were made from the account exceeding \$53 million. The approximate account balance on September 20, 2022, was \$296,427.88.

² TD Account 6004, WF Account 1308, and VNB account 5035 are now closed or inactive.

92. On November 2, 2022, a federal seizure warrant was executed and on November 17, 2022, \$12,148.44 (Def. No. 34) was seized from Investors Bank.

93. In March 2023, in compliance with the federal seizure warrant for Investors Bank account 1001808534, Citizen Bank sent a check payable to Customs and Border Protection in the amount of \$19,971.56 (Def. No. 35). Based on a public database search, Investors Bank transitioned to Citizens Bank in February 2023. On March 27, 2023, the money was seized from Citizens Bank.

Investors Bank account number 1001906426 (Def. No. 36)

94. Investors Bank account number 1001906426 was opened on May 5, 2022, under the names Khanna and Amandeep Khanna who are the only signatories on the account. Through September 30, 2022, the account was primarily funded with \$30,000 of suspected electronic payroll payments noted as “DG MIDWEST LLC PAYROLL” and over \$300,000 wire transfers from DG Midwest LLC, all representing proceeds from illegal activity. The account was primarily used make credit card payments. There were also two official checks purchased from the account totaling approximately \$230,706 for which no documentation was provided by the bank. The approximate account balance on September 30, 2022, was \$26,405.19.

95. On November 2, 2022, a federal seizure warrant was executed for funds in Investors Bank account ending in 6426. On November 17, 2022, \$8,409.78 was seized from Investors Bank account ending 6426.

Investors Bank account number 1001915510 (Def. No. 37)

96. Investors Bank account number 1001915510 was opened on May 6, 2022, under the name DG Auto Parts LLC, and signatories on the account are Navin Khanna, Tinu Khanna, and Amandeep Khanna. The account was primarily funded by transfers of more than \$1 million from Investors Bank account 1001808534 (Def. No. 40 and 41), representing proceeds from illegal activity. The account was used to make an approximate \$358,031 wire transfer to DG Midwest LLC and to make payments for the purchase of catalytic converters, including \$99,985 paid to Curtis Cores. The approximate account balance on September 30, 2022, was \$6,579.46.

97. On November 2, 2022, a federal seizure warrant was executed for funds in Investors Bank account ending in 5510. On November 17, 2022, \$241.80 was seized from Investors Bank account ending 5510.

Wells Fargo account number 3219351644 (Def. No. 38)

98. Wells Fargo Bank account number 3219351644 was opened on March 17, 2021, in the name of Tinu Khanna who is the only signatory on the account. The initial deposit to the account was \$81,061.85 from TD account ending in 9458, a now closed TD Bank account maintained by Tinu Khanna. Records obtained for TD account ending 9458 reflect that from January 2017 through approximately early December 2019, the main source of deposits were electronic funds transfers from Lyft and Uber, indicating Tinu Khanna was a rideshare driver. Records reflect that starting on

December 6, 2019, transfers from BOA Account 9405 were deposited into TD account 9458.

99. After DG Auto Parts LLC was created, BOA Account 9405 was closed and TD Bank account number 43690206004 was opened in the name of DG Auto Parts LLC. TD Account 9458 then began receiving transfers from TD Bank account number 43690206004. Prior to its closure, TD Account 9458 received over \$800,000 from BOA Account 9405 and TD Bank account number 43690206004, all representing illegal proceeds. On January 27, 2022, this account (Def. No. 44) received a \$50,000 wire transfer from Investor Bank account 8534 (Def. Nos. 40 and 41). There were no additional deposits to the account through August 15, 2022, at which time the approximate account balance was \$14,661. Along with the \$81,061.85 initial deposit from TD account 9458, the total illegal proceeds to this account was \$131,061.85.

100. On November 2, 2022, a federal seizure warrant was executed on the funds in Wells Fargo Bank account ending 1644. On November 22, 2022, \$13,168.21 was seized from Wells Fargo Bank account ending 1644.

Robinhood Investment Account 122315385 (Def. No. 39)

101. Robinhood Investment account number 122315385 was opened August 5, 2017, in the name of Tinu Khanna. Records indicate that from April 2021 through May 2022, Tinu Khanna's transferred approximately \$83,850 from Wells Fargo account 1644 (Def. No. 38) to this account, representing proceeds from illegal activity. Records indicate that from March 2020 through February 2021, Tinu Khanna

transferred approximately \$45,600 of illegal proceeds from TD Bank account 9458 (now closed) to this account. TD Bank account 9458 was funded by transfers from DG Auto Part's TD Bank account 6004, totaling over \$800,000 of illegal proceeds. The portfolio value for Robinhood Account 5385 was approximately \$49,916 on September 30, 2022.

102. On November 2, 2022, a federal seizure warrant was executed for funds in the Robinhood Investment account ending 5385. On December 21, 2022, \$30,052.35 was seized from Robinhood Investment account ending 5385.

TD Ameritrade account number 490-073668 (Def. No. 40)

103. Amandeep Khanna opened TD Ameritrade Account 3668 on June 15, 2017. In 2021 and 2022, this account was funded with \$135,000 from the now closed Wells Fargo account 1308 and \$200,000 from Investors Bank Account 8534 (Def. Nos. 34 and 35). The transfers from each account are funds from illegal proceeds. The portfolio value for this account on July 31, 2022 was \$398.00.

104. On November 2, 2022, a federal seizure warrant was executed on TD Ameritrade account ending 3668. On November 17, 2022, \$398.42 was seized from TD Ameritrade account ending 3668.

2019 Ferrari 488 Pista (Def. No. 23)

105. Khanna purchased a 2019 Ferrari 488 Pista (VIN: ZFF90HLA6K0241124) from Recovery Racing dba Ferrari and Maserati of Long Island on May 5, 2021. The vehicle was paid for via a wire transfer of \$443,575.00

from Valley National Bank Account 5035 to Recovery Racing. On the same date the wire was sent to Recovery Racing, Tinu Khanna posted a photograph of the Ferrari 488 Pista with temporary New York license plate of ZHF6497 with the caption “She’s home #488pista”. Based on the paver driveway in the photo, it appears the photo was taken at Khanna’s New Jersey residence. The investigation revealed that the temporary license plate of ZHF6497 comes back to a 2019 Ferrari 488 Pista (VIN: ZFF90HLA6K0241124). The records further reflect the vehicle was registered to DG Auto South in Gaston, North Carolina with a North Carolina license plate of JFN1322.

106. The money used to purchase the vehicle came from Valley National Bank Account 5035, funded mainly by wires from Dowa, probable cause exists to believe these funds represent proceeds of specified unlawful activity. Investigators further believe that by registering the vehicle in the name of DG Auto South, this transaction was designed to conceal or disguise the nature, location, ownership or control of the proceeds, in violation of federal law.

107. On November 2, 2022, a federal seizure warrant was executed for the 2019 Ferrari 488 Pista. On November 2, 2022, the 2019 Ferrari 488 Pista was seized in New Jersey.

2021 McLaren 765LT coupe (Def. No. 26)

108. On May 29, 2021, a 2021 McClaren 765LT, VIN SBM14RCA1MW765598 was purchased from Miller Motorcars LLC dba McLaren

Greenwich in Greenwich, Connecticut for \$548,237.00. The vehicle was paid for with a \$290,000.00 trade-in credit of a previously owned 2020 McLaren 720S coupe (VIN: SBM14FCA1W004387) and a \$258,237.00 wire transfer from Valley National Bank Account 5035. Registration history records for this vehicle reflect that DG Auto South was the buyer of the vehicle. The e-mail address love_jkl@me.com appears on the retail purchase order. This e-mail is an address known to be used by Khanna. Further, the purchase order reflects Lovin Khanna, 4304 Autumn Dr, Tinton Falls NJ 07753, DL# K3196 48900 08832 on the driver information. Khanna's signature was also observed on several other documents pertaining to the purchase. A copy of Khanna's driver's license was also provided to the dealership.

109. The money used to purchase the vehicle came from Valley National Bank account 5035, funded mainly by wires from Dowa. The trade in value from the 2020 McLaren represents proceeds of illegal activity as the 2020 McLaren was purchased with proceeds from TD Account 6004, funded mainly by wires from Dowa. Therefore, agents believe these funds represent proceeds of specified unlawful activity. Investigators further believe that by registering the vehicle in the name of DG Auto South, this transaction was designed to conceal or disguise the nature, location, ownership or control of the proceeds, in violation of federal law.

110. On November 2, 2022, a federal seizure warrant was executed for the 2021 McClaren 765LT. On November 2, 2022, the 2021 McClaren 765LT was seized in New Jersey.

2021 Jeep Gladiator (Def. No. 27)

111. A 2021 Jeep Gladiator (VIN: 1C6HJTAG9ML569941) was purchased by DG Auto South from Hollywood Chrysler Jeep, in Hollywood, Florida for \$44,261.82 on or about October 20, 2021. Nick Papouloglou a/k/a Nick Emporia was listed as the buyer. The day before the purchase, a wire transfer was made to South Florida Jeeps from DG Auto's Valley National Bank account 5035 in the amount of \$199,510.28. The investigation revealed that South Florida Jeeps specializes in modifying the Jeep Gladiator by adding a third axel to the vehicle. South Florida Jeeps calls the resulting 3-axel Jeep an "Apocalypse". Registration history records for this vehicle reflect that it was registered by Nick Emporia in North Carolina to DG Auto South.

112. On August 18, 2022, investigators conducted surveillance at Khanna's New Jersey residence. In the driveway was a Jeep Gladiator with a North Carolina license plate. The investigation revealed that this plate belongs to the 3-axel Jeep Gladiator (VIN: 1C6HJTAG9ML569941).

113. It is believed the money used to purchase the vehicle came from the wire transfer from DG Auto's Valley National Bank account 5035, funded mainly by wires from Dowa. Therefore, probable cause exists to believe these funds represent proceeds of specified unlawful activity. Investigators further believe that by registering the vehicle in the name of DG Auto South, this transaction was designed

to conceal or disguise the nature, location, ownership or control of the proceeds, in violation of federal law.

114. On November 2, 2022, a federal seizure warrant was executed for the seizure of the 2021 Jeep Gladiator. On November 2, 2022, the 2021 Jeep Gladiator was seized in New Jersey.

2016 Porsche Cayman GT4 (Def. No. 29)

115. A 2016 Porsche Cayman GT4 (VIN: WP0AC2A82GK191690) registered in the name of Tinu Khanna was purchased for \$80,775.90 on May 30, 2021. Records show that on July 7, 2021, Tinu Khanna wired \$29,907.97 to Capital One Auto Finance. In the memo/purpose section of the wire, it states “KHANNA, ACCOUNT NUMBER 620627328538”.

116. Records provided by Capital One Auto Finance revealed that Tinu Khanna purchased the vehicle from Automotive Avenues, LLC in Wall Township, New Jersey. The payment for the vehicle consisted of a trade-in credit of \$37,000.00 for a 2016 Tesla Model S, \$4,000.00 in cash and a loan from Capital One Auto Finance for \$40,928.20. According to Capital One and confirmed by a review of DG Auto’s TD Account 6004 and WF Account 1308, almost all of the payments made on this loan were from DG Auto. The wire transfer of \$29,907.97 on July 7, 2021 was for the payoff of the loan.

117. The money used to purchase the vehicle came from TD account 6004 and Wells Fargo account 1308, funded mainly by wires from Dowa. Agents believe these funds represent proceeds of specified unlawful activity.

118. On November 2, 2022, a federal seizure warrant was executed for the seizure of 2016 Porsche Cayman GT4. On November 2, 2022, the 2016 Porsche Cayman GT4 was seized in New Jersey.

A 2017 Lamborghini Huracan (Def. No. 24)

119. TD Account 6004 was opened on February 5, 2020 by Khanna and his brother Tinu Khanna. His wife, Amandeep Khanna, was added to the account on March 20, 2020. Since February 2020, wire transfers from Dowa into this account have totaled \$174,613,229.29. A 2017 Lamborghini Huracan Convertible (VIN: ZHWUR1ZF2HLA06147) was purchased from Pro Cars USA Inc., in Alsip, Illinois on December 17, 2020 after a \$197,330.00 wire transfer from TD Account 6004. Registration history records for this vehicle reflect that although DG Auto was the listed buyer and Tinu Khanna signed the buyer's order, the vehicle was registered in North Carolina in the name of DG Auto South, a DG Auto affiliate operated by Nick Emporia.

120. During the investigation it was discovered that Tinu Khanna maintains an Instagram account under the name "gagan.pista". On February 19, 2022, Tinu Khanna posted a photo on his Instagram account of four high-end sports cars in a garage with a caption that read "Garage is coming along #765lt #mclaren #488pista

#488 #812 #pista #812superfast #ferrari #huracan #lamborghini #needmorelifts”.

Investigators believe the Lamborghini Huracan Convertible is visible in the photograph. The garage windows shown in the photo contain grids consistent with the garage windows of Khanna’s New Jersey residence.

121. The insurance company that insures this vehicle is State Farm Mutual Automobile Insurance Company. A review of all known bank records pertaining to DG Auto South revealed no payments to State Farm Insurance. However, bank records pertaining to DG Auto revealed continuous payments to State Farm that began on December 21, 2020, which coincides with the purchase of the 2017 Lamborghini.

122. The money used to purchase the vehicle came from TD Account 6004, funded mainly by wires from Dowa. Therefore, agents believe these funds represent proceeds of specified unlawful activity. Investigators further believe that by registering the vehicle in the name of DG Auto South, this transaction was designed to conceal or disguise the nature, location, ownership or control of the proceeds, in violation of federal law.

A 2021 Mercedes Benz G63 AMG (Def. No. 25)

123. A 2021 Mercedes Benz G63 AMG, VIN W1NYC7HJ1MX371237, was purchased from AM Management dba Aston Martin Washington DC, located in Washington, D.C. on or about December 18, 2020. Registration history records for this vehicle reflect the purchase price was \$239,000. Of this amount, \$230,000 was

paid to AM Management via a wire transfer from TD Account 6004. A search of all available bank records pertaining to DG Auto did not reveal any additional payments by wire or check, therefore it is likely the \$9,000.00 difference was paid in cash. The registration history further revealed that although DG Auto was the listed buyer and Amandeep Khanna signed the buyer's order, the vehicle was registered in North Carolina in the name of DG Auto South, a DG Auto affiliate, operated by Nick Emporia. On December 21, 2020, Tinu Khanna posted a photograph on his Instagram account of the Mercedes Benz G63 AMG, with the caption "Winter ride #g63 #amg".

124. The money used to purchase the vehicle came from TD Account 6004, funded mainly by wires from Dowd, probable cause exists to believe these funds represent proceeds of specified unlawful activity. Investigators further believe that by registering the vehicle in the name of DG Auto South, this transaction was designed to conceal or disguise the nature, location, ownership or control of the proceeds, in violation of federal law.

A 2022 Mercedes Benz AMG GLE53 (Def. No. 28)

125. This vehicle was purchased from Investors Bank account 8534 (Def. Nos. 34 and 35). The investigation revealed check 1317 drawn on Investors Bank account 8534 to Contemporary Motor Cars in the amount of \$15,000 with a memo of "down payment 4JGFD6BB1NA789319" in the on September 2, 2022. The investigation revealed that 4JGFD6BB1NA789319 is the VIN for a 2022 Mercedes

Benz AMG GLE 53. The vehicle was registered on September 9, 2022 with the owner listed as DG Auto Parts, LLC located at 527 Okerson Road, Freehold, New Jersey. This address is the old DG Auto location.

126. It is believed the \$15,000 used to purchase the vehicle came from the DG Auto's Investors Bank account 8534 (Def. Nos. 34 and 35), funded mainly by wires from Dowa. Agents believe these funds represent proceeds of specified unlawful activity.

3 Bucks Mill Lane, Holmdel, New Jersey (Def. No. 48)

125. Wells Fargo Account 1308 was opened March 4, 2021, with Lovin Khanna and Tinu Khanna as signatories. Wire transfers from Dowa into this account totaled \$18,426,276.80. This account was closed in April 2022. From this account, Lovin Khanna engaged in the transaction involved in the purchase of the real property located at 3 Bucks Mill Lane, Holmdel, New Jersey. A note secured by a mortgage on real property located at 3 Bucks Mill Lane, Holmdel, New Jersey, was filed with the Monmouth County, New Jersey Recorder at Book OR-9497, Page 1110. According to property records, on or about March 18, 2021, Amandeep Khanna purchased the property for \$1,700,000. According to property records, this purchase was financed by a \$1,700,000 mortgage taken out by Amandeep Khanna as the borrower and DG Auto as the lender. The purchase price was paid in full via a \$1,700,000 wire transfer from Wells Fargo account 1308 to Property Transfer Services Inc. on March 18, 2021. The note called for annual payments commencing on

January 15, 2022 of not less than \$50,000.00 and a yearly interest rate of 2.25%. A review of all known DG Auto bank accounts reflected no such payment from Amandeep Khanna received in 2022, which agents believe was a cash purchase of the property. Because this transaction exceeded \$10,000.00 in proceeds of specified unlawful activity, agents believe it was carried out in violation of Title 18 U.S.C. § 1957(a), and therefore the note in the amount of \$1,700,000.00, secured by real property located at 3 Bucks Mill Lane, Holmdel, New Jersey, is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and Title 18 U.S.C. § 982(a)(1).

Assets at Khanna's Residence (Def. Nos. 17-21)

126. During the execution of the federal seizure warrant at the Khanna residence on November 2, 2022, agents discovered multiple pieces of jewelry (Def. No. 19), to include a silver bracelet with clear stones in a Louis Vuitton bag, a silver and orange Hermes bracelet, a pair of silver earrings with clear stones, a rose gold round edge bracelet with clear stones, two yellow metal bracelets with clear stones in a red box, a rose gold metal ring with red and clear stones. Agents also discovered seventeen loose gemstones (Def. No. 20) and thirteen gold bars (Def. No. 21).

127. Additionally, during the execution of the federal warrant at the Khanna residence on November 2, 2022, agents recovered several luxury watches (Def. No. 19), to include a Rolex Oyster Perpetual Date Adjust, a Mark Echo watch with silver band, a Rolex watch with red and blue detail, a Rolex watch with black and gold

detail, a gold Rolex watch, a Rolex watch with black and silver detail, a Philip Patek watch, a Hubolt watch, and a blue Bentley Motors by Breitling watch.

128. A Rolex Daytona Watch was purchased by Tinu Khanna from F Jewelers Inc. on or about May 19, 2021. Records of Tinu Khanna's Wells Fargo Account 1644 (Def. No. 38) reflect that on May 19, 2021, he wired \$18,500.00 to F Jewelers Inc. In the memo/purpose section of the wire, "Rolex Daytona" is written.

129. The money used to purchase the watch came from Wells Fargo Account 1644 (Def. No. 48), funded by BOA Account 9405 and TD Account 6004. Agents believe these funds represent proceeds of specified unlawful activity.

130. Agents located several foreign currencies throughout Khanna's residence (Def. No. 18), including Euros and Canadian dollars. In addition to the foreign currency located, agents discovered approximately \$1,062,199 in U.S. currency (Def. No. 17) at the Khanna residence.

131. Agents believe the jewelry and currency represents proceeds of specified unlawful activity.

242 Monmouth Road, Wrightstown, New Jersey (Def. 49)

132. As indicated earlier, Investors Bank Account 8534 (Def. Nos. 34 and 35) was opened November 4, 2021, with Navin Khanna and Tinu Khanna as signatories. Wire transfers from DOWA into this account totaled over \$175 million. From this account, DG Auto Parts, LLC engaged in the transaction involved in the purchase of the real property. According to property records filed with Burlington

County, New Jersey Recorder at Book OR-13623, Page 6920, on or about June 20, 2022, DG Auto Parts LLC purchased the real property. A payment in the amount of \$500,000.00 was made via a wire transfer from Investors Bank account 8534 to Counsellors Title Agency Inc. on June 28, 2022. Another payment in the amount of \$1,635,857.99 was made via a wire transfer from Investors Bank Account 8534 to Counsellors Title Agency Inc. on August 16, 2022. Because these transactions exceeded \$10,000.00 in proceeds of specified unlawful activity, probable cause exists to believe it was carried out in violation of Title 18 U.S.C. § 1957(a), and therefore the amount of \$2,135,857.99 secured by real property located at 242 Monmouth Road, Wrightstown, New Jersey, is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and Title 18 U.S.C. § 982(a)(1).

Assets at Blacey's Auto Parts (Def. No. 22)

125. During the execution of a federal search warrant at Blacey's Auto Parts, located at 242 Monmouth Road, Wrightstown, New Jersey, agents located approximately \$50,116 in U.S. currency. Agents believe, based on the investigation, that the money kept at the business location was to pay for stolen catalytic converters and business operating costs. It is further believed that the currency is proceeds of the sale and receipt of stolen catalytic converters.

18 Hanover Drive, Manalapan, New Jersey (Def. No. 50)

126. As indicated earlier, TD Account 6004 was opened February 5, 2020, with Navin Khanna and Tinu Khanna as signatories, and Navin Khanna's wife,

Amandeep Khanna, added to the account on March 18, 2020. Wire transfers from Dowd into this account totaled over \$174 million. This account was closed in April 2022. From this account, Amandeep Khanna engaged in the transaction involved in the purchase of the real property located at 18 Hanover Drive, Manalapan, New Jersey. According to property records filed with Monmouth County, New Jersey Recorder at Book OR-9418, Page 6339, on or about April 13, 2020, Amandeep Khanna purchased residential real property for \$277,000. A payment in the amount of \$118,924.95 was made via a wire transfer from TD Account 6004 to Coastal Title Agency Inc. on May 28, 2020. Because this transaction exceeded \$10,000.00 in proceeds of specified unlawful activity, agents believe it was carried out in violation of Title 18 U.S.C. § 1957(a), and therefore the amount secured by the real property located at 18 Hanover Drive, Manalapan, New Jersey, is forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (C) and Title 18 U.S.C. § 982(a)(1).

SHARKEY'S ASSETS

M&T Bank account number 9877247750 (Def. No. 42)

127. Capital Cores previously maintained a bank account at TD Bank. Capital Cores received over \$50 million in wire transfers from DG Auto from May 2020 through August 2022 to this account representing proceeds from illegal activity. Adam Sharkey, as owner and operator of Capital Cores, withdrew over \$8 million in cash from the account during this same time period. Wire transfers to TD Bank for approximately \$890,499 from Elevation Auto Core LLC, \$292,440 from Curtis Cores,

and \$458,000 from Superior Auto Recycling Inc, representing proceeds from illegal activity. Sharkey directed wire transfer payments totaling over \$38 million from this account for what appear to be the purchase of catalytic converters, and over \$23 million of this amount was made to individuals believed by law enforcement to be involved with stolen catalytic converters. Sharkey maintained the Capital Cores bank account at TD Bank until approximately August 31, 2022.

128. Account number 9877247750 was opened in the name of Capital Cores Corp. with Sharkey and Marion Sharkey as signatories for the account. The opening account documents indicate the account on was opened in December 2020. The beginning account balance on August 1, 2022, was \$382. DG Auto wire transferred approximately \$69,955 to this account from August 12, 2022, through September 30, 2022, and total deposits during this time frame were \$70,161. The approximate account balance on September 30, 2022, was \$36,133.

129. On November 2, 2022, a federal seizure warrant was executed on the funds from M&T Bank account ending 7750. On November 22, 2022, \$35,472.60 was seized from M&T Bank account ending 7750.

M&T Bank account number 9889478252 (Def. No. 41)

130. Account number 9889478252 was opened in the name of Adam Sharkey and Marion Sharkey. The account had a zero balance on August 23, 2022, and \$3,500 deposits to this account through September 30, 2022, consisting of transfers from M&T

Bank account number 9877247750 representing proceeds from illegal activity. The approximate account balance on September 30, 2022, was \$2,652.

131. On November 2, 2022, a federal seizure warrant was executed for the seizure of funds in M&T Bank account ending in 8252. On November 22, 2022, \$3,390.90 was seized from M&T Bank account ending in 8252.

BULK CURRENCY SEIZURES (Def. Nos. 43-45)

125. On May 3, 2022, \$500,000 in United States currency (Def. No. 43) was seized at the Tulsa International Airport, in Tulsa, Oklahoma. The currency was transported by Shane Minnick, as an employee of Curtis Cores. Shane Minnick transported bulk catalytic converters to Brighton, Colorado in a rented truck. After receiving payment for the delivery of catalytic converters, Minnick purchased a plane ticket to return to the Northern District of Oklahoma. Minnick was stopped by law enforcement at the Tulsa airport, in possession of the currency that agents believe represent the proceeds of the sale of stolen catalytic converters.

126. On May 9, 2022, \$1,129,000.00 in United States currency (Def. No. 44) was seized on a traffic stop conducted on E. Highway 60, Wynadotte, Oklahoma. The currency was driven by Robert Sharkey and Alice Sharkey in a rental truck, along with pallets of catalytic converters. The Sharkeys traveled from New Jersey to the Northern District of Oklahoma, intended to deliver the bulk currency and catalytic converters to

Tyler Curtis and Marty Macerauskas. The currency is proceeds of the sale of stolen catalytic converters, originating from Navin Khanna and Adam Sharkey.

127. On July 29, 2022, a federal search warrant was executed at the residence and business location of Martinas and Kristina Macerauskas. During the search, agents located \$1,075,000 in U.S. currency (Def. No. 45). Based on statements made by Macerauskas, agents believe the money was used to facilitate the purchase, sale and transport of stolen catalytic converters and was proceeds of a specified unlawful activity.

CONCLUSION

128. It is the belief of your affiant that the Defendant Property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) because it is any property, real or personal, which constitutes or is derived from the proceeds traceable to a violation of, and/or is used to facilitate 18 U.S.C. § 371 (Conspiracy to commit the following offenses), 18 U.S.C. § 1343 (Wire Fraud) and/or is property traceable to, and/or used to facilitate, 18 U.S.C. § 1952(a) (interstate and foreign travel or transportation in aid of racketeering enterprises) and/or is property traceable to, and/or used to facilitate, 18 U.S.C. § 2314 (transportation of stolen goods) and/or is property traceable to, and/or used to facilitate, 18 U.S.C. § 2315 (RCSP); and the property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) because it is any property, real or

personal, involved in a transaction or attempted transaction in violation of 18 U.S.C.

§ § 1956 and/or 1957 (money laundering).

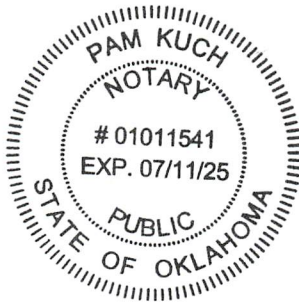
Further, Affiant sayeth not.



KANSAS CORE
Task Force Officer
Homeland Security Investigations

Subscribed and sworn to before me by the said Kansas Core on this the 31st day of May, 2023.

(seal)



Notary Public, State of Oklahoma